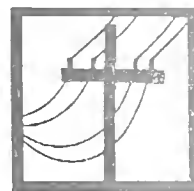


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March 1993

# Progress



## Montana Pole Superfund site

By the Montana Department of Health and Environmental Sciences  
and the U.S. Environmental Protection Agency

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### INTRODUCTION

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The Montana Department of Health and Environmental Sciences (MDHES), U.S. Environmental Protection Agency (EPA) and the Citizens Technical Environmental Committee (CTEC) co-sponsored a public meeting on December 10, 1992, in Butte. The purpose of the meeting was to discuss with the community their concerns and questions regarding potential cleanup options for the Montana Pole Superfund site and future use of site property.

The meeting began with an introduction from Bill MacGregor of CTEC. Brian Antonioli, site project officer for MDHES, presented an overview of the cleanup options. Butte-Silver Bow City/County Planning Director Jon Sesso spoke about current and future land use and what must be done to implement a particular land use.

The meeting was attended by nearby Williamsburg and Boulevard neighborhood residents, other Butte residents, private businesses, Atlantic Richfield Company (a potentially responsible party), Butte/Silver Bow government, local politicians and a number of CTEC members. The audience broke into small groups and answered a series of questions concerning cleanup options and future land use. CTEC

members kept notes for each group and an MDHES or EPA representative recorded the main discussion points on flip charts. (See questions list below.) After about 45 minutes, the audience reconvened and each group summarized their discussion.

This progress report summarizes the notes taken during large and small group discussions. MDHES, EPA and CTEC have tried to include all comments, questions and concerns that arose. If you attended the meeting and commented, but your comment is not reflected in this progress report, please contact Jane Heath Stiles, MDHES Superfund Public Information Officer in Helena at 1-800-648-8465.

Results of the meeting will help MDHES and EPA evaluate community acceptance of cleanup alternatives. The meeting helped the agencies identify issues of concern to the community and questions to be answered. A formal public comment period will be held later this winter or in early spring when MDHES releases the site feasibility study and proposed plan for cleanup of the site. A formal public hearing will be held during the comment period. Everyone on the site mailing list will receive a notice of the comment period and hearing.

## WHAT QUESTIONS DID MDHES ASK THE PUBLIC?

Following is a list of questions MDHES asked the public at the December 10, 1992, meeting in Butte. On the following pages are the answers to these questions.

1. The level of cleanup at the Montana Pole site depends a great deal upon the type of future land use and groundwater use expected or desired for the area. Cleanup of the site to make it safe for residential use or to restore the groundwater to drinking water quality requires more extensive and expensive cleanup. How do you feel about the site's future land and groundwater uses?

2. Some alternatives require that "institutional controls" be put in place to prevent certain types of land use or use of the

groundwater. Examples of institutional controls include deed restrictions, fencing the site, restricting site access and so on. These institutional controls may need to be in place for a long time (i.e. longer than 30 years). What do you think about this?

3. One alternative uses a temporary on-site incinerator to burn contaminated soils, oils and sludges. This incinerator would be on-site for approximately one to two years. What concerns, if any, do you have with this alternative and what conditions would this alternative need to meet to alleviate those concerns?

4. One alternative uses biological treatment of soils to reduce levels of contamination. This alternative may take many years

(Cont. on page 2)

# Montana Pole

## QUESTIONS, cont. from page 1

to complete (more than 10). How do you feel about: a) biological treatment, and b) the length of time biological treatment takes?

5. Although the alternative using biological treatment of soils will reduce the levels of most contaminants in the soil, it may not reduce levels of some contaminants (such as dioxins) to levels below cleanup goals. If this were the case, at the completion of treatment the treatment unit(s) would likely be capped and institutional controls used to prevent use of the area. What do you think about this?

6. One of the objectives of a groundwater treatment system for the site is to contain the contaminated groundwater using physical or hydraulic barriers and prevent the contaminated groundwater from migrating to Silver Bow Creek or surrounding groundwater. Under some of the alternatives where large amounts of contamination are left in place at the site, this groundwater system may need to be operated permanently (i.e., longer than 30 years). How do you feel about this?

## ~ INCINERATION ~

(Question 3 listed on page 1 of this progress report was used to encourage discussion of incineration)

**Q.** How hot does incineration burn?

**A. MDHES:** The kind we are considering burns soils in a primary chamber at about 800 degrees, then burns the gases in a second chamber at about 2,300 degrees.

**Q.** Have you looked at taking the wastes to Montana City, Magnetohydrodynamics (MHD) facility in Butte or Rhone Poulenc for incineration?

**A. MDHES:** When we looked at off-site incineration, we were able to look only at facilities that are currently operating and licensed to burn hazardous materials. We can't count on any of those being licensed.

**Q.** Can pentachlorophenol be burned?

**A. MDHES:** Yes.

**Q.** Is incinerator ash toxic?

**A. MDHES:** An incinerator operation at the site would be required to destroy organic (carbon-based) contaminants to non-toxic levels in the ash.

**Q.** Will the incinerator need water to run?

**A. MDHES:** Water is typically used to cool the gases in the incinerator. A constant amount of water is required.

**Q.** Is the licensing moratorium on hazardous waste incinerators an issue?

**A. MDHES:** Only for off-site incinerators. On-site incineration can take place under Superfund law without going through the usual licensing process.

### *Comments and concerns voiced at the public meeting:*

#### Length of time:

- Want short-term cleanup but concerned about safety of emissions.
- Seasons for incineration are longer than for bioremediation, (bioremediation is most effective during warm weather).

#### Pollution control issues:

- State and EPA seem to be leaning toward incineration. Incineration is not as benign as it is portrayed. Incineration can create more toxic chemicals, more dioxin than when you started and incomplete combustion of toxic products. Waste ash disposal is a problem, as is air pollution which could be spread throughout Butte. Incineration does not guarantee that no contamination will be released. Butte has air pollution problems which shouldn't be increased.
- Concerned about manner of operation including proper start-up, shut-down, retention time, etc.
- Want strict monitoring of contractor's operation.
- Feels confident about protectiveness in terms of public health.
- Incinerators are getting better but there are none in Europe that have been proven safe.
- Has doubts about management. Is concerned about quality control and escape of dioxin.
- Concerned about what would happen when air inversions exist and wonders what kinds of emissions will come out of the incinerator stack.
- Concerned about Butte's air inversions, general air quality problems. Air quality in the Boulevard area near the site is a concern.
- Emissions: wants state and federal control, agencies should speed up testing, air testing on site should be continuous for dioxins, daily testing on inversion days 24-hours, operators should have temperature up before incineration begins and the system should have immediate shutdown for high emissions.
- Favors incineration, if proper precautions are taken on monitoring, start-up and immediate shutdown.
- Low thermal efficiency is a problem with pentachlorophenol and dioxin.
- Incineration tends to generate particulates.
- Dr. John Ray of Butte, a professor at Montana Tech, offered comments concerning incineration in the form of an information sheet. For the purposes of the progress report, we have summarized Dr. Ray's main points. Anyone wishing a complete copy of his information sheet should call him at 496-4228 (work) or 782-0681 (home) or call MDHES at 1-800-648-8465 in Helena. Dr. Ray is opposed to incineration for the following reasons: 1) Incineration produces severe health and



environmental problems relating to gaseous and particulate emissions. 2) The residual ash of the incineration process creates severe health and environmental problems. 3) Incineration can lead to ground and surface water pollution. 4) Incineration is not cost effective. 5) Incinerators have negative economic consequences.

#### General issues:

- Questions the amount of noise from an incinerator, but the noise probably couldn't be worse than a gravel crusher.
- MDHES should investigate options other than incineration. In case of sludge, just incinerate. Can specifically add microbes to enhance breakdown of contamination in soils and sludges.
- Incinerator may create some jobs.
- The most heavily contaminated soil should be segregated after burning and capped. Concentrate the contaminated soil so it can be evaluated in the future.
- Smell from incineration is a concern.

#### Public participation:

- Want lots of public participation before an incinerator goes on site.
- People who have wood stoves are under tight restrictions.

They may feel resentful of an incinerator.

- Community concerns could be alleviated by addressing the following issues: air quality monitoring, controls, ash disposal and increase in cost.
- Doesn't want the state to set a precedent for burning hazardous wastes in Butte.

#### Possibility of off-site incineration:

- Off-site incineration is preferred.

#### Cost of incineration:

- Cost is too high.

#### *MDHES response to comments/concerns:*

MDHES identified three major comments/concerns about incineration: 1) some citizens are absolutely opposed to incineration under any circumstances, 2) some would accept incineration if strict controls are enforced, and 3) some people are concerned about the toxicity of waste ash from the incinerator. If on-site incineration is chosen MDHES would further investigate the potential health threat from incineration and would enforce strict controls on emissions. Based on information from the EPA, MDHES believes that the ash would not be toxic. Ash would be analyzed to verify its safety.

## ~ BIOREMEDIATION ~

(Questions 4 and 5 on pages 1 and 2 of this progress report were used to encourage discussion of bioremediation)

Q. Would rather see treatment done in place. Is there a way to in-situ bioremediate soils?

A. MDHES: Yes, and we are considering this in the feasibility study. However, in-place bioremediation is not effective for oils and is not as effective as excavating soil and treating it above ground.

Q. Will it be more expensive in the long run? MDHES should have realistic predictions of costs in the future.

A. MDHES: A detailed cost analysis of this and the other treatment technologies we are considering (soil washing and incineration) will be presented in the feasibility study.

Q. Biological treatment is the way to go. How fast can this be done? Keystone did treatability studies with fungal bioremediation. What was the outcome?

A. MDHES: Bioremediation could take two to 18 years. Keystone had good results — up to 95 percent destruction of pentachlorophenol. These reports are available in the administrative record.

#### *Comments and concerns voiced at the public meeting:*

- Alternative No. 4 is misleading - you can enhance biological degradation to speed up contaminant breakdown.
- It's the thrust of the future because it's a natural process and land use stays the same.

- There may be some groundwater problems.
- There are too many unknowns with biological treatment.
- There is an injectable form of bioremediation that can be pumped into groundwater to speed contamination breakdown.
- Bioremediation doesn't break down dioxin in groundwater.
- Ultra violet oxidation will destroy dioxin. Should combine this method with bioremediation.
- Two thumbs up for bioremediation.
- If you can't prove the effectiveness of bioremediation, don't do it.

#### Completeness and costs of bioremediation:

- Bioremediation is not a complete cleanup and could be more costly in the long run.
- There is the possibility of new "bugs" being developed.
- It's economical.
- Bioremediation is not a complete cleanup solution.

#### Health effects:

- Bioremediation means lower community impact than with incineration: no emissions and no heavy trucks through town.
- Concerned about residual contamination.
- Concerned about length of time it would take because until cleanup is achieved, there is the potential for public exposure to contaminants.

#### Bioremediation and future land use:

- Concerned about compatibility of commercial use and bioremediation.

(Cont. on page 4)

# Montana Pole

## Length of time bioremediation takes:

- Disagree about the length of time. We would only enhance the indigenous bacteria.
- Wants control of contamination now.
- White rot fungus can reduce time to three years and can also be injected into the groundwater.
- Is against biological treatment because it takes too long in this climate.

## Community participation:

- People living next to it should have a say.
- There are too many unknowns. Things could happen in the meantime and control over cleanup may be lost.

## What about institutional controls after bioremediation? (Question 5 listed on page 1 of this report)

- If we are going to end up with institutional control and capping, then bioremediation is unacceptable.
- Will probably have to do permanent treatment in any event at least because of contamination under the interstate.
- Bioremediation is uncertain; there is no guarantee it will be effective.
- MDHES must further investigate current dioxin research.
- Opposed to this option; unacceptable. Do not favor; don't like it.
- Digging up soils may leave a "big" hole.

- Does capping soils preclude industrial use - asphalt?
- Capping is not acceptable if it prevents all land uses.
- Leave options open. Set end goals which must be met.
- Tie it into ultimate use of the land.
- Delineate land uses if capping will be done.
- Distinguish between preventing and restricting land use.

## *MDHES response to comments/concerns:*

MDHES identified four main comments about bioremediation: 1) that bioremediation is preferred over incineration, 2) that bioremediation takes too long, 3) that bioremediation is not acceptable if there is no future use of the land after bioremediation and 4) that there are health concerns during bioremediation because of blowing dust and direct exposure. The length of time bioremediation takes may vary based on the methods used, the volume of soil treated and the amount of land available at the site. Because of strong public feelings that the area be usable in the future and because the levels of contamination left in soil after treatment may preclude certain land uses, MDHES will evaluate the effectiveness of bioremediation to determine what levels of contamination will be left in soil after treatment. Health concerns during bioremediation would be addressed by ensuring that dust and vapor releases are controlled, and by restricting public access to the site.

## ~ WATER ~

(Questions 1 and 6 on pages 1 and 2 of this progress report were used to encourage discussion of groundwater)

**Q.** Cleanup upstream on Silver Bow affects downstream. Do we know what the effects will be?

**A.** MDHES: We feel that releases of pole plant contaminants to Silver Bow Creek can be reduced to meet regulatory or risk-based levels.

**Q.** With just soil capping, is there a potential for groundwater contamination in the Boulevard area?

**A.** MDHES: We don't think so, because the groundwater system will create a hydraulic gradient away from the Boulevard neighborhood.

**Q.** Doesn't groundwater run toward the lower area?

**A.** MDHES: Yes, but the elevation of groundwater in the Boulevard is higher than at the plant so groundwater flows from the Boulevard area toward the plant.

**Q.** Has MDHES evaluated the amount of contamination in Silver Bow Creek under all alternatives?

**A.** MDHES: Our objective is to get those site-related contaminants to a level so that the creek is swimmable, drinkable and fishable. Any of the three remedies combined with the system EPA is putting in right now under the emergency removal should result in water discharged to Silver Bow Creek which meets water quality standards. Metals contamination in

the creek will be addressed separately under the Silver Bow Creek/Butte Area Superfund cleanup.

**Q.** Won't future pumping of groundwater lower the water table?

**A.** MDHES: It could possibly happen. We have not evaluated that yet, but this will be addressed during the design phase before site cleanup.

**Q.** Shouldn't we start cleanup by stopping dumping of raw sewage into Silver Bow Creek?

**A.** MDHES: That kind of dumping sounds illegal, but it is outside the scope of this investigation. The MDHES Water Quality Bureau regulates that kind of activity.

**Q.** Isn't there a water treatment plant there now? What is the cost?

**A.** MDHES: Yes, it was installed by EPA under their time-critical removal action. It is designed to address immediate problems. MDHES hopes to integrate it with our permanent decision. The feasibility study estimates the cost of a water treatment plant at \$6 million. The cost of the EPA plant is about \$1.3 million.

**Q.** Do any of the three alternatives achieve surface water quality goals?

**A.** MDHES: Yes, physical barriers or pumping can be used to prevent migration of contamination to Silver Bow Creek.

**Q.** Long-term treatment is required in any situation. What are long-term costs?

**A. MDHES:** A detailed cost analysis for long-term treatment will be provided in the Feasibility Study Report due out later this spring.

**Q.** Is there a well ban in this area now?

**A. MDHES:** Yes, Butte-Silver Bow has implemented a city-wide ban on using well water for drinking in order to pay for a new water system

**Q.** Could a filtering system be put on Silver Bow Creek?

**A. MDHES:** Yes, it is technically possible to run the entire creek through a treatment facility. However it is more cost effective to prevent contamination from being released into the creek.

## *Comments and concerns voiced during the public meeting:*

### Future groundwater use:

- Cleanup of groundwater should be permanent and to the best possible level. Should not degrade groundwater if it's not in the spirit of the law.
- Don't want groundwater cleanup to take forever but wouldn't use water no matter what.
- If the groundwater is cleaned up it could provide increased tax base.
- Groundwater can never be cleaned up.
- Not concerned about drinking water standard.
- There is no drive to use groundwater right now.
- Want to protect adjacent groundwater use for irrigation and to meet agricultural standards.

What about a permanent groundwater treatment system? (Question 6 listed on page 2 of this progress report):

- A permanent pump and treat system is not acceptable. We don't accept leaving contaminants in the groundwater.
- There will be permanent groundwater treatment regardless and it would be good to prevent contamination of area wells, at least because of the material under the highway.
- Would like to remove contamination quicker; use current system to the fullest.
- The City of Butte should pursue operation of water treatment facility.
- If you remove contaminated source soils, you may get to cleanup levels. If you clean up down to groundwater, you'll shorten time needed for pump and treat.
- Can reduce infiltration to limit groundwater contamination.
- Spend money on groundwater treatment, then cap and use area for industry.
- If EPA's current system is working, it should be continued.
- If in-situ bioremediation would enhance cleanup, it should be instituted.
- Ask oil companies how they do it.
- A permanent facility may be acceptable.
- Contamination under the interstate should be cleaned up.

## *MDHES response to comments/concerns:*

MDHES identified two major comments on this issue: 1) that groundwater cannot be cleaned up and 2) that clean groundwater is important even if it isn't used for drinking. MDHES believes that groundwater at the site can be cleaned, but only if contaminated source soils and associated wood treating products are cleaned up. MDHES recognizes that clean groundwater is important not only for potential drinking water but also for other uses such as irrigation.

## ~ PUBLIC HEALTH ~

**Q.** I am concerned about health effects on people who worked at the plant. I want a study of health effects on workers. Will they be tested?

**A. MDHES:** This is an important issue. Under Superfund we can really only address future problems. The Occupational Safety and Health Administration and the Centers for Disease Control in Atlanta can be requested to come in and look into those issues. MDHES encourages you to talk further with CTEC about this. They are willing to help the community further investigate these issues.

**Q.** In 1955 pentachlorophenol was not considered so hazardous. Why has that changed?

**A. MDHES:** More has been learned recently about its health effects. The Federal Agency for Toxic Substances and Disease Registry tells us that exposure to large amounts of pentachlorophenol in a short time may result in profuse sweating, fever, weight loss, gastrointestinal irritation, lung, eye, liver and kidney damage, convulsions, heart failure and even death. Longer-term effects include a higher incidence of low-grade infections and depressed kidney function. It has been identified

as a probable human carcinogen (cancer-causer).

**Q.** What are the potential public health risks of soil washing?

**A. MDHES:** Nearby residents could be exposed to contaminated dust during excavation and handling/processing of the soils. Dust control activities can be implemented to limit or prevent this potential exposure.

## *Comments and concerns voiced at the public meeting:*

- Safety of equipment and buildings purchased from Montana Pole.
- A man said he can't get the equipment he purchased off the site.
- MDHES should evaluate what will be the public health and environmental risks during cleanup.

## *MDHES response to comments/concerns:*

MDHES identified two major concerns on this issue: 1)

(Cont. on page 6)

# Montana Pole

## HEALTH CONCERNS (From page 5)

that the health of personnel who worked at the plant needs to be investigated and 2) that there is concern about the potential public health risk during site cleanup. Health of past workers is not addressed by the Superfund program, but rather by Occupational Safety and Health Administration or the Centers

for Disease Control. In the feasibility study report, the evaluation of cleanup alternatives will address impacts to public health. Specific health and safety measures that will need to be implemented during site cleanup will be determined during remedial design.

## ~ INSTITUTIONAL CONTROLS ~

(Questions 1 and 2 on page 1 of this progress report were used to encourage discussion of institutional controls)

### *Comments and concerns voiced during the public meeting:*

- Opposed to institutional controls. They are unacceptable for the following reasons:
  - a) too much governmental control already
  - b) favors residential use
  - c) It's better to keep land in the private sector
- No matter what, some contaminants will remain.
- To be realistic, you can't escape institutional controls.
- Institutional controls - personally, wouldn't drill/dig even after cleanup.

### Possible land use and institutional controls:

- It is possible to develop for a trailer park or apartment buildings compatible with institutional controls.

- Cleanup should segregate the more contaminated areas.
- The area does need some development.
- Residential use of the site is not possible.
- Would like cleanup to allow some land use.
- Problem with tourism-people — site creates a bad image
- Prefers Alternative 4 (partial excavation), although unless all contamination is dug up and treated, there is still potential to dig up contamination.
- Whatever cleanup occurs south of I-90, should allow residential/recreational development, even if institutional controls are needed to protect those residents.

### *MDHES response to comments/concerns:*

Institutional controls will likely play an important role at the site no matter which cleanup alternative is chosen. The public will also play an active role in institutional controls such as zoning of the area, as pointed out by Butte-Silver Bow Planner Jon Sesso.

## ~ FUTURE LAND USE ~

(Questions 1 and 2 on page 1 of this progress report were used to encourage discussion of future land use.)

**Q.** The current zoning at Montana Pole is for light or heavy industrial use. What if you wanted to change the use?

**A.** Jon Sesso, Butte-Silver Bow City County Planner: Zoning or land plan could be changed. Public hearings are involved and a sponsor is required.

**Q.** Could an owner or caretaker of an industry have a home in this zone?

**A.** MDHES: M-1 zoning south of the interstate allows business owners and caretakers to have homes in the area.

**Q.** Industry/business wouldn't want the site because of future liability. What would a landowner's status be?

**A.** MDHES: Under both federal and state law, the owner or operator of the property can be held liable for cleanup costs. However, if the remedy is effective in attaining all cleanup goals, there would be no future cleanup costs for which future landowners would be liable. To the extent contamination remains on the property, liability would remain a concern.

**Q.** How long will MDHES maintain a cap?

**A.** MDHES: If a cap is used it would require maintenance indefinitely.

### *Comments and concerns voiced during the public meeting:*

#### Choosing a future land use:

- More information must be gathered about comparing remedy, cost, time, side benefits and liabilities for the various potential land uses.

#### Restrictions of land use:

- Land use restrictions will take place anywhere. There are many such restricted sites in the Butte area.
- Don't fence the site; short-term restrictions are okay, but long-term are not. Why not choose the best for Butte?
- Operating costs of a long-term cleanup are significant.
- The site is currently under private ownership so deed restrictions could be implemented.

#### Preferred future uses:

- The site should remain light industrial; residential use of the groundwater is not feasible.
- Two votes for residential use, since they are homeowners in the area. Maximum cleanup of waste is the preferred method.
- It is a good area for residential use because it's secluded,



there's not much dust or smoke and it's a good central location.

- If it's not residential, perhaps it could be a miniature golf
- Possibly use the site for commercial and residential or light industrial.
- Spend now or spend later.
- Want to have a future land use other than industrial, south of the interstate. Don't sacrifice safety. Capping doesn't preclude all uses.
- Over the long term, restricted land use is not favored.
- Opposed to heavy industrial.
- Possibly create a park
- A cleaned up site could help raise tax base.
- Don't use it for heavy industry. If you are going to spend so much money cleaning it, then make it less an eyesore and more residential or commercial. Out of heavy industrial because of vicinity of two neighborhoods.
- Advocates higher level of cleanup geared to future land use; prefers shorter length of cleanup so community can use site again sooner, as long as costs/cleanup levels result in a buffer zone between the two neighborhoods.

- The site land may become valuable if Butte grows because it is centrally located.
- The area north of the interstate is in flood plain.
- Land values will rise and this property will become more valuable.
- Institutional controls are okay as long as community can have their preferred land use.
- Use site for tourism, shops, parks. Don't cap it.

## Landowner liability issues:

- There is some concern that there is no interest in development because of potential liability.
- Lending institutions probably still won't lend for it.

## **MDHES response to comments/concerns:**

MDHES recognizes that there is strong public sentiment to clean up the site so that it is useful in the future. MDHES will consider these views and public acceptance when selecting a cleanup option.

## ~ MISCELLANEOUS ISSUES ~

Q. How many gallons of pentachlorophenol have been collected and how many remain?

A. MDHES: About 20,000 gallons of wood treating fluid with about five percent pentachlorophenol have been removed so far. An estimated 50,000-200,000 gallons remain in the soil and groundwater.

Q. What has been spent on the site so far?

A. EPA: We have spent \$7.8 million. ARCO: We have spent \$3 million on the remedial investigation and feasibility study.

Q. Which of nine criteria relates to permanence?

A. MDHES: Long-term effectiveness and permanence.

Q. How much cleanup is expected from each alternative?

A. EPA: The goal is one part per billion pentachlorophenol in the creek. The new water treatment plant is meeting that level. The feasibility study will be more specific.

Q. I bought a double drum hoist from the pole plant. Is it contaminated?

A. MDHES: It may be contaminated if it has wood treating fluid on it.

Q. Will ARCO be around to pay for long-term costs?

A. MDHES: There is no guarantee that any potentially responsible party would be around forever. Therefore, the agencies would require that whoever pays for the cleanup also provide financial mechanisms to ensure that any long-term operation and maintenance can be paid for.

*Comments and concerns voiced at the public meeting;*

Things for the agencies to consider when choosing an alternative:

- A quick fix is not necessarily best, and there may eventually

be a better technology.

- The issue boils down to short-term high-risk vs. long-term low-risk.
- The agencies should evaluate benefits and liabilities of each option in terms of economics and sociological factors, not just a scientific evaluation.
- A long-term cleanup may give people a better appreciation of the mess created. A quick fix won't.
- Wants to see a list of liabilities/benefits of each remedy.
- If big money will be spent to clean up, the future use better recoup it.
- Put a memorial in to honor those who worked at the pole plant.
- Would like to see the word "permanence" used, as required by EPA law.
- Future landowner liability issues must be addressed now.
- Future land value should balance cleanup costs.
- MDHES should identify/quantify health risks for all alternatives.
- Incineration equals short-duration cleanup with high exposure.
- Biological treatment equals long-duration cleanup with low exposure.

## **MDHES response to comments/concerns:**

Many of the issues raised by the miscellaneous comments will be addressed by the feasibility study report. The public will also be given the opportunity to ask questions and provide comments during the public comment period on the proposed plan and feasibility study.



**MDHES Superfund Hotline**

**1-800-648-8465**

**Just use it!**

## ~ WHAT'S NEXT? ~

The next step in the Superfund process for the Montana Pole site is public review of the remedial investigation report. The remedial investigation details the extent and severity of site contamination. The draft report is expected to be ready for public review near the end of February. A 30-day comment period will follow. Shortly thereafter, the feasibility study and proposed plan listing alternatives for cleanup will be released for a minimum 30-day public comment period. During that time, MDHES will hold a formal public hearing with a court reporter transcribing the comments. This comment period is expected to begin in March.

In the meantime, anyone wishing to speak to a Superfund staff member about the site is encouraged to call any of the following:

Brian Antonioli, MDHES site project officer  
Jane Heath Stiles, Superfund public information officer  
Montana Department of Health and Environmental Sciences  
Cogswell Building  
Helena, MT 59620  
1-800-648-8465 or (406) 449-4067

Sara Weinstock, EPA site project manager  
U.S. Environmental Protection Agency  
Federal Building  
Helena, MT 59601  
(406) 449-5414

### ARE YOU ON OUR MAILING LIST?

If you did not receive this publication in the mail and wish to be placed on the mailing list for future publications about the Montana Pole Superfund site, please fill out, detach, and mail this form to: Jane Heath Stiles, Montana Department of Health and Environmental Sciences, Cogswell Building, Helena, MT 59620.

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750 copies of this public document were published at an estimated cost of \$0.25 per copy, for a total cost of \$187.67 which includes \$60.92 for printing, and \$126.75 for distribution.

Montana Dept. of Health and Environmental Sciences  
Cogswell Building  
Helena, MT 59620